

CQ/DMP:AFM/JAM/SW
F. #2021R00874

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

Cr. No. _____

ANATOLY LEGKODYMOV,
also known as “Anatolii Legkodymov,”
“Gandalf” and “Tolik,”

(T. 18, U.S.C., §§ 982(a)(1), 982(b)(1),
1960(b)(1)(C), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p))

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

OPERATION OF AN UNLICENSED MONEY SERVICES BUSINESS

1. On or about and between January 1, 2016 and January 17, 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANATOLY LEGKODYMOV, also known as “Anatolii Legkodymov,” “Gandalf” and “Tolik,” together with others, did knowingly and intentionally conduct, control, manage, supervise, direct and own part of an unlicensed money transmitting business affecting interstate and foreign commerce, to wit, the business operating under the names “Bitzlato Limited” and “ChangeBot,” which involved the transportation and transmission of funds known to the defendant to have been derived from a criminal offense and intended to be used to promote and support unlawful activity.

(Title 18, United States Code, Sections 1960(b)(1)(C), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to the following assets, all seized on or about January 17, 2023 from a residence on 177th Street, Miami, Florida:

- (a) one black Lenovo Thinkpad;
- (b) one silver iPad with serial number GJDW91W49J;
- (c) one silver Google Pixel Pro 6; and
- (d) one black Lenovo Thinkpad with factory identification number JVHFC1.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

Claudia Quiroz

CLAUDIA QUIROZ
ACTING DEPUTY CHIEF, CCIPS
ACTING DIRECTOR, NCET
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ANATOLY LEGKODYMOV,
also known as “Anatolii Legkodymov,” “Gandalf” and “Tolik,”
Defendant.

INFORMATION

(T. 18, U.S.C., §§ 982(a)(1), 982(b)(1), 1960(b)(1)(C), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p)))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Artie McConnell and Alexander F. Mindlin, Assistant U.S. Attorneys
(718) 254-7000